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July 23, 2020

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Court Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Real Selling Group LLC v. ESN Group, Inc.*
SDNY Case No. 1:20-cv-01468

Dear Judge Buchwald:

After the telephonic pre-motion conference in the above captioned matter on June 16, 2020, the parties have conferred regarding a briefing schedule for Defendant's Motion to Dismiss for Lack of Personal Jurisdiction. Attached please find the Parties' Stipulation and Proposed Order on Briefing Schedule for Defendant's Motion to Dismiss for Lack of Personal Jurisdiction. The parties' proposal is as follows:

Defendant's moving papers shall be filed on or before August 11, 2020.
Plaintiff's opposition shall be filed on or before September 11, 2020.
Defendant's reply to the opposition shall be filed on or before September 22, 2020.

The Parties appreciated the Court's guidance at the pre-motion conference and are available at the Court's convenience to discuss the proposed schedule.

Respectfully Submitted,

/s/ Stephen E. Paffrath

Stephen E. Paffrath

cc: Adam E. Engel